

REMARKS

In regard to section 1 of the office action, the three EP references noted by the examiner were cited in U.S. patent application No. 10/157,524 filed May 28, 2002, now U.S. Patent No. 6,648,688. This can be seen from the References Cited section on the front page of the Patent. However, to speed review by the examiner, enclosed is an additional copy of the references and another PTO-1449 for the examiner's use.

In regard to section 2 of the office action, the title has been amended above as requested by the examiner. This amendment of the title should not be interpreted as limiting the claimed invention.

In regard to section 3 of the office action, claim 13 has been amended to add the word "ground" as requested by the examiner. However, the first word in each of the dependent claims has not been changed. Use of the word "A" rather than "The" to start a dependent claim is acceptable by the USPTO as evidenced in the MPEP §608.01(n) which mentions examples of acceptable dependent claim wording including, for example, "Claim 5. A gadget according to claims ...". Most U.S. patents use the word "A" rather than "The" to start a dependent claim, but either word is acceptable.

Claim 25 has been amended to correct a minor typographical error. This change does not narrow or limit the scope of the claimed invention.

Claims 14, 17, 18 and 19 have been converted from dependent form into independent form. This change does not narrow or

limit the scope of the claims. In view of section 6 of the office action, claims 14-19 should now be in condition for allowance.

Claims 13, 20-22, 25, 30-32, 34 and 35 were rejected under 35 U.S.C. §102(e) as being anticipated by Mitra (US 6,520,802 B1). The examiner is requested to reconsider this rejection.

Mitra has a reference date under MPEP §2136.03(II)(B and C) of December 14, 2001 (completion date of 35 U.S.C. §371(1)(2)(4)) because it has an international filing date before November 29, 2000. The present application has priority back to May 30, 2001 (The Netherlands patent application Nos. 1018175 and 1018176; certified copies filed in the U.S. parent patent applications). Thus, Mitra is not prior art under 35 U.S.C. §102(e). English language translations of the priority documents can be provided if requested by the examiner. However, the PCT parent of Mitra was published by WIPO on January 4, 2001 (WO 01/01524). Applicants' attorney does not have a copy of that publication.

Claim 13 claim a terminal block having a ground contact. The ground contact is adapted to directly contact a ground area of **another terminal block placed against the ground contact.** Mitra discloses a module 6 with two shielding plates 60 between a pair of printed circuit boards 7. However, there is no disclosure or suggestion of the shielding plates 60 being ground contacts. There is no disclosure or suggestion that the mating male connector 41 electrically contacts the shielding plates. In fact, the overmolded layer 44 of the male connector 41 appears to electrically insulate the male

connector's metal plate 43 from the shielding plates 60. Thus, shielding plates 60 do not appear to be ground contacts. There is also no disclosure or suggestion that the shielding plates 60 of a first module 6 are adapted to contact a ground area of another module 6 placed against the shielding plate 60. There is no disclosure or suggestion that the shielding plates 60 of one module 6 contacts a ground area of another module 6. Thus, Mitra does not "anticipate" claim 13, and the examiner should withdraw his rejection of claim 13 under 35 U.S.C. §102(e).

Though dependent claims 20-24 contain their own allowable subject matter, these claims should at least be allowable due to their dependence from allowable claim 13. However, to expedite prosecution at this time, no further comment will be made.

In anticipation of the examiner attempting to use 35 U.S.C. §103(a) and Mitra in rejecting any of the claims of the present application, it needs to be pointed out to the examiner that the present application has priority back to May 30, 2001 and Mitra did not issue until Feb. 18, 2003. Mitra is owned by the same owner as the present application FCI. Mitra and the present application were, at the time the invention of the present application was made, **commonly owned**. The examiner is directed to MPEP §706.02(1)(2). In accordance with MPEP §706.02(1)(2)(II), it is understood that this statement alone is sufficient evidence to disqualify Mitra from being used in a rejection under 35 U.S.C. §103(a) against the claims of the present application.

Claim 25 claims a terminal block having a ground contact. The ground contact is adapted to contact a contact area of a ground layer of **another terminal block** subsequently located against the housing at the contact lip, and a portion adapted to contact a ground contact in a mating electrical connector. Again, the shielding plates 60 in Mitra are not disclosed as being ground contacts. There is no disclosure in Mitra that the shielding plates 60 are adapted to contact a contact area of a ground layer of another module 6 subsequently located against the housing. There is no disclosure in Mitra that the shielding plates 60 have a portion adapted to contact a ground contact in a mating electrical connector. Mitra does not "anticipate" the features claimed in claim 25.

Though dependent claims 26-31 contain their own allowable subject matter, these claims should at least be allowable due to their dependence from allowable claim 25. However, to expedite prosecution at this time, no further comment will be made.

Claim 32 claims a terminal block having ground contacts. The ground contacts comprise a spring type contact lip. There is no disclosure of this feature in Mitra. Therefore, Mitra does not "anticipate" the features of claim 32.

Though dependent claims 33-35 contain their own allowable subject matter, these claims should at least be allowable due to their dependence from allowable claim 32. However, to expedite prosecution at this time, no further comment will be made.

Appl. No.: 10/634,312
Reply to Office Action of: 5/10/2004



For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issue remain, the examiner is invited to call applicants' attorney at the telephone number indicated below.

Respectfully submitted,

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8/10/04
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